MEMO ENDORSED

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____

DATE FILED: 4/28/21

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ADMITTED IN NY & CA
STUART GOLD

April 27, 2021

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

We write the Court requesting, respectfully, two modifications of Mr. Jacobs's pretrial release conditions.

First, we request a modification of Mr. Jacobs's travel restrictions to permit travel to the District of Connecticut and the Eastern District of Pennsylvania. As the Court may know from prior applications, Mr. Jacobs has a business installing and servicing credit card processing machines. He has both current and potential clients in Connecticut and eastern Pennsylvania, and would like to travel to the two Districts listed above to conduct meetings and install credit card readers in furtherance of his business. Mr. Jacobs has taken several trips since the origination of this case and has always returned within the allotted time and has otherwise adhered scrupulously to his conditions of release.

Second, Mr. Jacobs would like permission to apply for a new passport. Mr. Jacobs's passport was in the possession of undersigned counsel (specifically, in counsel's backpack) when the passport was stolen from counsel's home during a burglary in the early morning hours of March 31, 2021. (Counsel had taken possession of the passport, with the knowledge of Pretrial Services, to allow Mr. Jacobs to renew his driver's license.) Attached to this letter is a redacted version of the New York Police Department report filed after the burglary was discovered. Mr. Jacobs would like to obtain a new passport, and asks the Court to modify the condition of release prohibiting him from obtaining new travel documents for this one purpose.

We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services (Officer Dominique Jackson). The Government and Pretrial have each graciously consented to these requests. Thank you for your consideration.

Respectfully submitted,

S

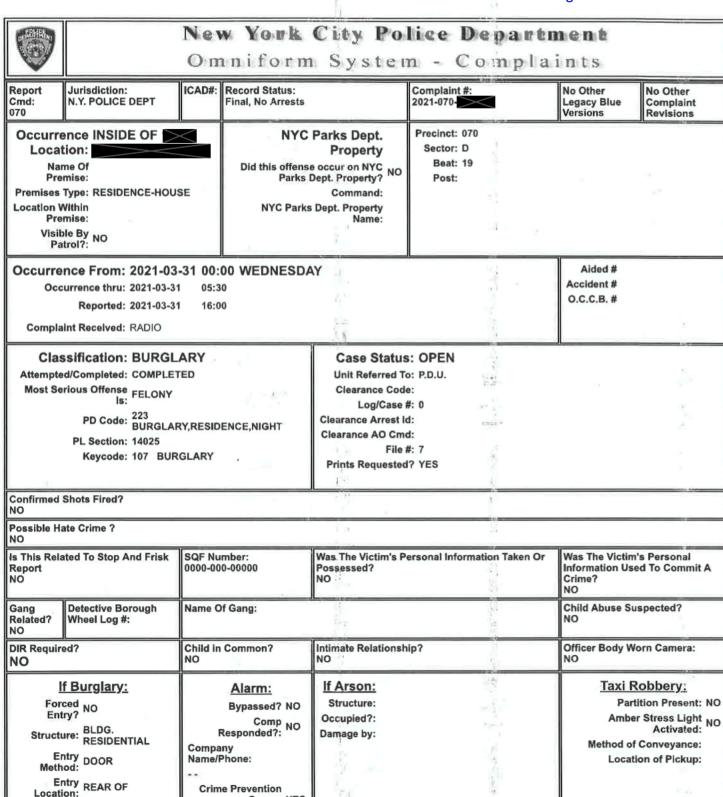
Marc Agnifilo

Zach Intrater

cc: AUSAs Samuel Raymond & David Felton (via email)
Pretrial Services Officer Dominique Jackson (via email)

The application is **GRANTED**. So Ordered.

Ansha 7 Cak 2/28/21



Supervisor On Scene - Rank / Name / Command: SGT

Canvas Conducted:

Survey YES

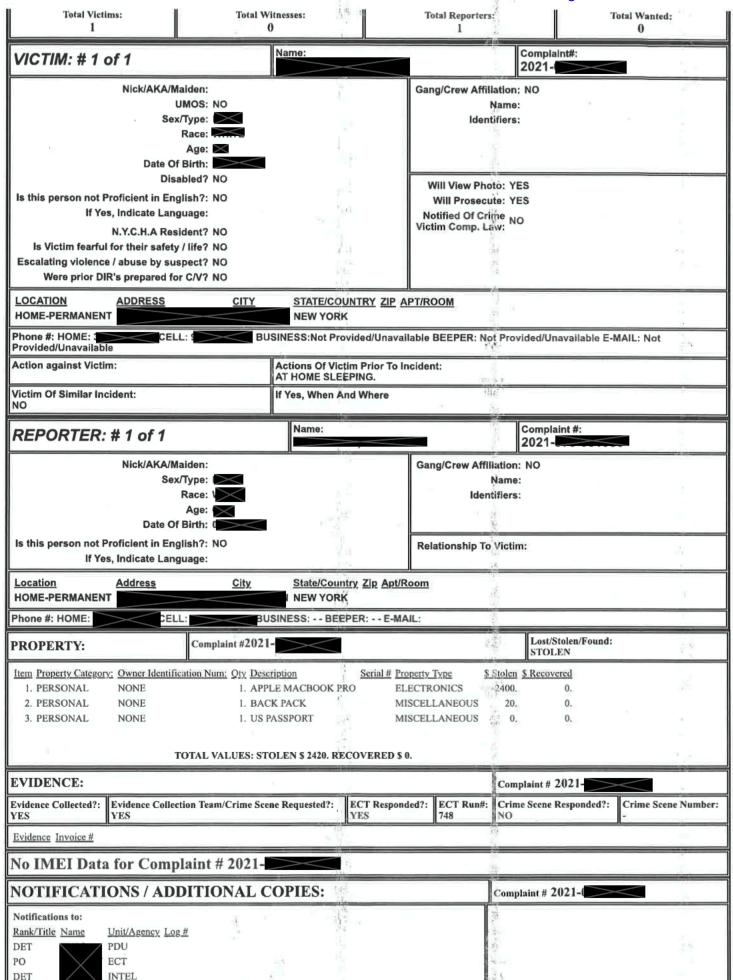
Crime Prevention

Requested?: Complaint/Reporter YES Present?:

Translator(if used):

Location:

AT TPO UNKNOWN PERP DID ENTER ABOVE LOCATION WITHOUT PERMISSION OR AUTHORITY TO DO SO AND DID REMOVE A LAPTOP, BACKPACK AND PASSPORT. UNKNOWN PERP DID LEAVEA SCOOTER AND A PAIR OF SHOES. PDU NOTIFIED, ECT NOTIFIED. SGT ON SCENE. NO WEAPONS, NO INJURIES. NO CAMERAS AVAILABLE. C/V ALSO STATES HE DID LEAVE BACK DOOR UNLOCKED AND NOTICED OPEN IN THE



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Reporting/Investigating M.O.S. Name:	Tax #:	Command: 070 PCT	Rep.Agency: NYPD
Supervisor Approving Name: SGT	Tax #:	Command: 070 PCT	Rep.Agency: NYPD
Complaint Report Entered By:	Tax #:	Command: 070 PCT	Rep.Agency: NYPD
Signoff Supervisor Name: SGT	Tax #:	Command: 070 PCT	Rep.Agency: NYPD
	END OF COMPLAINT REPORT # 2021-	Ę.	10